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U.S. BANKRUPTCY COURT  
MARY A. SCHOTT, CLERK

1 CA Construction  
2 Chris McKinney  
3 127 De Normandie Way  
4 Martinez, CA 94553  
5 (925) 917 - 0887  
6 21techlife@gmail.com  
7 Creditor, In Proper Person

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA

9 IN RE;

10 DORA DOG PROPERTIES, LLC

11 DOG BLUE PROPERTIES, LLC

12 BRANDY BOY PROPERTIES

) Case No.: BK-19-50103-gs  
) (Chapter 7)

) Response to Documents 680, 684

) Hearing Date: August 11, 2022

) Hearing Time: 9:30 a.m.

15 **OPPOSITON TO TRUSTEE'S SECOND AMENDED OMNIBUS OBJECTION TO**  
16 **PROOFS OF CLAIM**  
17

18  
19 CA CONSTRUCTION (CHRIS MCKINNEY), a creditor in this case, opposes the TRUSTEE  
20 'S SECOND AMENDED OMNIBUS OBEJCTION TO PROOFS OF CLAIM, which was filed by  
21 STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, on behalf of W. DONALD  
22 GIESEKE, the TRUSTEE in this case.  
23

24  
25 My opposition is based upon and supported by the following Memorandum of Points and  
26 Authorities, the pleadings and papers on file with the Court, the attached declaration and exhibits, and  
27 any argument the Court may allow at the time of hearing.  
28

**MEMORANDUM OF POINTS AND AUTHORITIES**

I oppose THE TRUSTEE'S SECOND AMMENDED OMNIBUS OBJECTION TO PROOFS OF CLAIM on file with the Court for the following reasons and based upon the facts, law, and legal analysis below:

The debt owed me by the debtor(s) in this case is for work contracted with Dog Blue Properties LLC and completed by me or others that were subcontracted and paid by me. Signed Quotes, Contracts, and Invoices, as well as Checks written and signed by the Debtors, seized by Federal Agents, clearly show the Debtors acknowledgement of their responsibility of this debt.

It appears that the Trustee is objecting to my Proof of Claim based on the Relation Back Doctrine and the fact that the properties I performed work at were seized by the Federal Government. This Objection is invalid as I contracted and performed work for Dog Blue Properties LLC as the property manager, not as the owner of the real property. Whether the title of the properties was held by the Debtor, The Federal Government, or any other 3<sup>rd</sup> party is irrelevant to the contracts written for and signed by Priscilla Amato on behalf of Dog Blue Properties LLC as they were acting as the property management company. Priscilla Amato introduced herself as having the title of Property Manager. She is the only individual I had contact with, submitted quotes to, and the signer for all contracts written for Dog Blue Properties LLC. Whether they owned the real property or held the title

1 is not in debate in this case as they were the acting property management company at the time she  
2 signed the contracts for the work required to maintain, improve, prepare for rent, or otherwise manage  
3 the properties at which I am owed compensation for my services. At no time did I know or check to  
4 see who owned the properties I provided my services for as I, at no time was I under the impression  
5 that I was working for the owners of these properties. The services I provided were to make the  
6 properties able to be legally rented or sold at a fair market value. These services were necessary  
7 regardless of who owned or managed the properties.  
8  
9

10  
11  
12  
13 Respectfully Submitted,  
14

15 DATED this 25th day of August 2022.  
16  
17  
18

19 By: CHRIS MCKINNEY / CA CONSTRUCTION

20 Creditor, In Proper Person

21  
22   
23

24  
25 I declare under penalty of perjury under the law of the State  
26 of Nevada that the foregoing is true and correct.  
27  
28

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY that on August 26, 2022, I served the above OPPOSITION TO TRUSTEE'S SECOND AMENDED OMNIBUS OBJECTION TO PROOF OF CLAIMS**

**by email to the persons and email address listed below:**

**STEPHEN R. HARRIS**

**HARRIS LAW PRACTICE LLC**

**steve@harrislawreno.com**

**Respectfully Submitted,**

**DATED this 25th day of August, 2022.**

**By: CHRIS MCKINNEY (CA CONSTRUCTION)**

Creditor, In Proper Person



**I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.**